

C A D W A L A D E R

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May 20, 2025

VIA ECF

The Honorable John G. Koeltl
Daniel Patrick Moynihan Courthouse
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: ***Leadenhall Capital Partners LLP, et al. v. Wander, et al.***, No. 24-cv-3453-
JGK (S.D.N.Y.)

Dear Judge Koeltl:

We write on behalf of Advantage Capital Holdings LLC and Kenneth King (together, “the A-CAP Defendants”), pursuant to Practice I.A of the Court’s Individual Practices, to respectfully request that the Court grant the A-CAP Defendants leave to file a corrected copy of their Opposition to Leadenhall’s Contempt Motion (“Opposition”) with additional redactions.

The Court previously granted A-CAP Defendants’ letter motion to seal portions of their Opposition and supporting papers. (ECF No. 312.) However, certain footnotes containing commercially sensitive, non-public information were inadvertently left unredacted in the public version of the A-CAP Defendants’ Opposition (ECF No. 307). Specifically, the additional footnotes requiring redaction are notes 1, 8, 11, and 12.

Pursuant to the District’s ECF Case Filing Rules & Instructions No. 21.7, the A-CAP Defendants requested emergency sealing of that document. Now, in accordance with R&I 21.7, the A-CAP Defendants respectfully request leave to file a corrected redacted version of its Opposition, and for the Court to permanently seal ECF No. 307.

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The substance of the Opposition is unchanged in the corrected version; only the redactions have been updated.

Respectfully submitted,

/s/ Jonathan M. Watkins

Jonathan M. Watkins

JMW

Copies to:

All Counsel of Record